

REMARKS

Request for Reconsideration

Applicants have carefully considered the matters raised by the Examiner in the outstanding Office Action but remain of the opinion that patentable subject matter is present.

Applicants respectfully request reconsideration of the Examiner's position based on the above amendments to the Specification, amendments to the Claims, the attached Figure 2C and the following remarks.

Drawing Objections

The drawings had been objected to because the image print apparatus of Claim 7 was not clearly shown in the drawings. As the Examiner should appreciate, the image printing apparatus of Claim 7 is clearly disclosed in the Specification on page 20, lines 11-15. Based on this disclosure, FIG. 2C has been presented based on Fig. 2B, wherein the storage unit and the difference comparison/detection unit have been moved from the computer down into the printer. The system has been labeled 100C, the computer 10C and the printer 20C. Otherwise, the

reference characters remain the same. It is respectfully submitted that FIG. 2C is clearly supported by the description and, thus, should be entered herein.

Additionally, the Specification has been amended because of the addition of 2C both in the Brief Description of the Drawings on page 11 in the description on page 20.

Claim Objections

The Examiner had objected to Claims 2 and 5 for various reasons. Claims 2 and 5 have been amended herein as suggested by the Examiner.

Claims 1, 2, 3, 6-8 and 12 had been objected to because these claims refer to converted printing information but there are two conversion steps.

Each of these claims has been amended herein to delete the term "converted". It is submitted that by deleting the term "converted", the claims have been clarified.

Claim Rejection Under 35 USC 112

Claim 8 had been objected to as not having antecedent basis for the term "said storage means" in line 19. Claim 8 has been amended herein to change "said storage means" to "a storage means".

Claim Amendments

The claims have been amended herein to better define the two conversion steps. The printing information converting unit converts image information into print information. The print information converts both input image information as well as image information which are determined to be different by the difference comparison/detection unit. Thus, the independent claims have been amended herein to make this clear.

As will be brought out in more detail below, one of the unique aspects of the present Invention is that the input image information is compared to the stored image information; a difference between the input information and the stored information is detected; and the detected difference between the image information and the stored information is converted to print information. In other words, a comparison is made between two different image

information before converting the image information to print information. As noted above, it is believed that the amendments made to the claims make this clear and these amendments are deemed to distinguish over the references.

Prior Art Rejection

The Examiner had made the following Prior Art rejections:

- (1) Claim 7 had been anticipated by Miyoshi;
- (2) Claims 1, 3, 4, 11 and 12 had been rejected as being unpatentable over Noble in view of Johnson;
- (3) Claims 6, 9 and 10 had been rejected as being unpatentable over Noble and Miyoshi;
- (4) Claim 8 had been rejected as being unpatentable over a combination of Miyoshi and Parker; and
- (5) Claims 2 and 5 had been rejected as being unpatentable over Noble, Johnson and Miyoshi.

Turning first to Miyoshi, the Examiner pointed to paragraph 76 for teaching the difference comparison/detection unit and to paragraphs 81 and 82 for teaching converting the detected difference between the input information and the stored information into print information. Paragraphs 74-76, 81 and 82 teach that the comparison is made to image data. Image data is equivalent to bit data. Thus, Miyoshi is not teaching that image information is compared but, rather, bit data of image information is compared, see Fig. 10 and step 1226 wherein the web page is converted into image data. Bit data is not the same as image data.

Turning to Noble, the Examiner takes the position that Noble teaches a difference comparison/detection unit and cites column 8, lines 13 and 25-26. The Examiner also takes the position that Noble teaches converting the difference between the input image information and the stored information to print information at column 8, lines 24-38.

In these paragraphs of Noble, he teaches comparing CRC data for different image information. Noble's CRC data is signatures summary of data, see column 5, line 47. This is where Noble refers to the definition of CRC data in U.S. Patent 5,898,836. In the '836 Patent, CRC is referred to as condensed signature or fingerprints of documents, see column 6, line 38. Thus, Noble is not comparing input data to stored data but is, rather, comparing a summary or condensed signature or fingerprint which identifies the data. According to the '836 Patent, these signatures are supposed to be different every time one changes the document. Thus, Noble is not comparing image information but, rather, a tag or summary of the image information which is entered into the machine.

Johnson does not teach a difference comparison/detection unit or conversion of difference between input image information and stored information to print information.

In Parker, the Examiner is pointing to paragraph 65 as teaching a difference comparison/detection unit. This paragraph in Parker refers to step 178 in Figures 7 and 8. Figures 7 and 8 show that the image data is transformed

prior to the comparison. Note, specifically, paragraph 61 which discloses the transformation and the type of software used for the transformation. This software is creating bit data. In any event, Parker is not comparing image data, per se, but comparing transformed image data.

Thus, each of the Prior Art references is directed to comparing bit data and not image data, per se. As noted above, the claims specifically have been amended to refer to comparing image data. Thus, it is respectfully submitted that the claims, as presented herein, are patentable over the references taken alone or in combination.

Conclusion


In view of the foregoing, it is respectfully submitted that the Application is in condition for allowance and such action is respectfully requested.

Should any fees or extensions of time be necessary in order to maintain this Application in pending condition, appropriate requests are hereby made and authorization is given to debit account #02-2275.

Respectfully submitted,

LUCAS & MERCANTI, LLP

By:



Timothy D. Meade, Reg.#55,449
(Attorney for Applicant)
475 Park Avenue South
New York, New York 10016
Tel. # (212) 661-8000

DCL/mr

Attached: FIG. 2C